

ERIN L. BRINKMAN (SBN 289967)
Unite the People
3003 W. Olympic Blvd Ste. 1031
Los Angeles, CA 90006
Telephone: (888) 245-9393
E-mail: erin@unitepeople.org
Attorney for Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Amitabho Chattopadhyay,
et. al.
Plaintiffs,

**BBVA Compass Bancshares, Inc.,
et. al.,
Defendants.**

Case No. 3:19-cv-01541-JST

**DECLARATION OF ERIN BRINKMAN IN
SUPPORT OF OPPOSITION TO MOTION TO
DISMISS PURSUANT TO RULE 12(b)(6)**

Date: October 2, 2019
Time: 2:00 p.m.
Room: Courtroom 9 - Floor 19
450 Golden Gate Ave.
San Francisco, CA 94102

Judge: Hon. Jon Tigar

DECLARATION

I, Erin Brinkman, declare as follows:

1. I am over 18 years old and I make this declaration on the basis of my personal knowledge of the facts set forth below, with the exception of whichever facts may be stated on information and belief. Nonetheless, I believe those facts to be true. If called upon to testify, I could and would testify competently in support of each and every single fact stated herein.

2. I am counsel for the plaintiffs in this case, and write and file this declaration in support of the attached opposition.

3. Pursuant to Civil Local Rule 7-5(a), I declare that all factual contentions made in support of my attached motion are true and correct.

4. I declare under penalty of perjury under the laws of the United States that the

1 foregoing is true and correct.

2 Respectfully submitted,
3 /s/ Erin L. Brinkman
4 Erin L. Brinkman
5 August 19, 2019
6 Counsel for Plaintiffs
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27